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BEFORE THE  
SOUTH CAROLINA  
PUBLIC SERVICE COMMISSION

DOCKET NO. 2001-084-C



IN THE MATTER OF THE APPLICATION OF METROPOLITAN  
TELECOMMUNICATIONS OF SOUTH CAROLINA, INC. D/B/A MetTel FOR A  
CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY TO PROVIDE LOCAL  
EXCHANGE AND INTEREXCHANGE TELECOMMUNICATIONS SERVICES, FOR  
ALTERNATIVE REGULATION FIRST APPROVED IN DOCKET NO. 95-661-C, AND  
FOR FLEXIBLE REGULATION FIRST APPROVED IN DOCKET NO. 97-467-C

TESTIMONY OF ANDONI ECONOMOU

INTRODUCTION

1 Q: Please state your full name, business address, and title.

2 A: My name is Andoni Economou and my business address is 44 Wall Street, 14<sup>th</sup> Floor,  
3 New York, NY 10005. I am the Executive Vice President of Metropolitan  
4 Telecommunications of South Carolina, Inc. d/b/a MetTel ("MetTel").

5  
6 Q: Are all statements in MetTel's Application and in this Testimony true and  
7 correct to the best of your knowledge, information and belief?

8 A: Yes.

9  
10 Q: What is the purpose of your testimony?

11 A: The purpose of my testimony is to support the application of MetTel before the  
12 Commission, to demonstrate that MetTel possesses the financial, technical, and managerial



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resources to provide telecommunications services in the State of South Carolina, to show that MetTel is otherwise fit, willing and able to provide the aforementioned services in this State, and to demonstrate that the public convenience and necessity supports granting MetTel's application.

### DESCRIPTION OF METTEL

**Q: Please describe the current corporate structure of MetTel.**

**A:** MetTel was incorporated on August 8, 2000 as a Delaware corporation.

A copy of the Company's Articles of Incorporation is attached as **Exhibit B** to the Application in this Docket.

**Q: Has MetTel qualified to do business in the State of South Carolina?**

**A:** Yes. The qualifying document is also attached to the Application as **Exhibit B**.

### TECHNICAL, FINANCIAL AND MANAGERIAL QUALIFICATIONS

**Q: Please describe MetTel's financial qualifications to operate a telecommunications enterprise in South Carolina.**

**A:** MetTel has raised sufficient capital to deploy facilities and provide service in South Carolina and in other markets. In addition, MetTel will raise additional capital as necessary to fund its ongoing operations. **Exhibit C** to MetTel's application demonstrates the financial ability of the Company. MetTel is a wholly owned subsidiary of Manhattan Telecommunications Corporation ("Manhattan"). As it has done in other markets,

1 Manhattan will invest the necessary capital in its South Carolina network to provide a  
2 competitive and economically viable service.

3  
4 **Q: Please describe MetTel's managerial and technical qualifications.**

5 A: As described in the biographical information accompanying its application (See  
6 **Exhibit A**), MetTel has put together a management team with extensive telecommunications  
7 and business experience. The Company will seek to recruit and retain additional technical,  
8 operational and sales personnel with experience in the local exchange and long distance  
9 businesses.

10  
11 **Q: Does MetTel possess the requisite financial, managerial and technical abilities to**  
12 **provide the services for which it seeks authority?**

13 A: Yes.

14  
15 **SERVICES TO BE OFFERED**

16 **Q: What services will MetTel offer?**

17 A: MetTel seeks authority to provide local resale and facilities-based local exchange  
18 services, as well as interexchange (intraLATA and interLATA) services. Specifically,  
19 MetTel intends to offer enhanced network services, Internet services, local exchange  
20 services, long distance services, switched access services, special access services, private line  
21 services, and integration services.

**Q: How will MetTel provide services in South Carolina?**

A: MetTel intends to launch service by reselling the services of the ILECs and purchasing unbundled network elements (“UNEs”) from the Incumbent Local Exchange Carriers (“ILECs”). Specifically, MetTel will purchase the UNE Platform or (“UNE-P”). The UNEs MetTel intends to purchase include Dark Fiber, High-Capacity Loops, Asymmetrical Digital Subscriber Line (“ADSL”), Generic Digital Subscriber Line (“xDSL”), Loops and subloop components, and UNE combinations.

**Q: Is MetTel aware of the Commission’s bond/certificate of deposit requirement with respect to the offering of debit or prepaid calling cards?**

A: MetTel is aware of the Commission’s bond/certificate of deposit requirement. Should the Company plan to offer such a service in the State of South Carolina, an appropriate bond or certificate of deposit will be secured and filed with the Commission.

**Q: Does MetTel plan to offer local exchange telecommunications services in areas served by rural telecommunications carriers?**

A: MetTel seeks statewide authority to the extent permitted by law. Unless otherwise permitted by federal or state law, MetTel does not plan to offer local exchange telecommunications services in areas served by any “rural” ILEC, except for those that have voluntarily entered into an agreement with a competing telecommunications service provider. MetTel intends to execute a Stipulation with the South Carolina Telephone Coalition (“SCTC”), and will abide by that Stipulation’s provisions with respect to providing services

1 in the participating companies' exchange areas. MetTel reserves the right to expand its  
2 services into these areas should any rulings of the Commission or any court or administrative  
3 agency allow the provision of service in such areas.

4  
5 **ARRANGEMENTS WITH UNDERLYING/INCUMBENT CARRIERS**

6 **Q: What carriers will MetTel utilize to provide interexchange services?**

7 A: MetTel is currently determining the underlying carriers with which it will do  
8 business. MetTel can assure this Commission it will only contract with those carriers that  
9 have been properly certified by this Commission.

10  
11 **Q: Has MetTel initiated negotiations with one or more of the incumbent LECs for**  
12 **interconnection agreements in the State of South Carolina?**

13 A: Yes. MetTel has executed an interconnection agreement with BellSouth  
14 Telecommunications, Inc. for the State of South Carolina, as well as the entire nine-state  
15 BellSouth region. That agreement will be filed with the Commission for approval. In the  
16 future, MetTel may negotiate one or more agreements with other non-rural LECs in the state  
17 of South Carolina.

**AUTHORIZATION AND OPERATION IN OTHER JURISDICTIONS**

**Q: Has MetTel received authorization to provide telecommunications services in any other jurisdiction?**

**A:** Yes. MetTel has received certification to provide local exchange access and interexchange services in the States of Connecticut, Florida, Maine, Nevada, Oklahoma, Oregon, Rhode Island, Texas, Vermont, Virginia, Washington, and Wisconsin. MetTel is also authorized and providing services in the states of New York, New Jersey, Massachusetts and Pennsylvania. MetTel intends to seek additional certifications and authorizations in the future.

**Q: Has MetTel ever been denied authority to operate or had its authority revoked in any jurisdiction?**

**A:** No.

**Q: Has MetTel ever been the subject of an investigation by any state regulatory body or by the Federal Communications Commission ("FCC")?**

**A:** No.

**Q: Has any state ever revoked the certification of MetTel?**

**A:** No.

**Q: Has MetTel ever been investigated or sanctioned by any regulatory authority for service or billing irregularities?**

**A: No.**

### **REGULATORY TREATMENT**

**Q: Has MetTel sought alternative regulation in connection with this Docket?**

**A: Yes.** MetTel requests that its business service offerings be regulated pursuant to the procedures described and set forth in Order Nos. 95-1734 and 96-55 issued in Docket No. 95-661-C.

**Q: Has MetTel sought flexible regulatory treatment in connection with this Docket?**

**A: Yes.** MetTel requests that the Commission allow MetTel to employ the flexible local exchange rate structure first authorized by Order No. 98-165 issued in Docket No. 97-467-C.

### **PUBLIC INTEREST CONSIDERATIONS**

**Q: Will the grant of a Certificate of Convenience and Necessity to MetTel, serve the public interest?**

**A: Yes.** The grant of a certificate of public convenience and necessity to MetTel to provide facilities-based and resold services within South Carolina will benefit the public because it will increase competition and customer choice for users of interexchange, exchange access, and local exchange services. MetTel's provision of service is expected to improve the price and quality of telephone service in South Carolina. Additionally, MetTel's

1 entry into the market will neither prejudice nor disadvantage any class of telephone  
2 customers or providers. On the contrary, the presence of another authorized carrier will  
3 provide additional consumer choice, promote competition, lower prices, and stimulate  
4 development of additional telecommunications services.

5  
6 **Q: Does MetTel intend to comply with all Commission rules, statutes and Orders**  
7 **pertaining to the provision of telecommunications services in South Carolina?**

8 A: Yes.

9  
10 **Q: Who is knowledgeable about MetTel's operations and will serve as the**  
11 **Company's regulatory and customer service contact?**

12 A: Irina Avagyan is knowledgeable about MetTel's operations and will serve as the  
13 responsible regulatory officer for the Commission to contact regarding MetTel's filing  
14 requirements subsequent to certificate approval.

15  
16 **Q: Does this conclude your testimony?**

17 A: Yes.